

EXHIBIT B**IMPROPER CLAIMS OF PRIVILEGE AND DIRECTIONS NOT TO ANSWER AT THE DEPOSITION OF SPEAKER TURZAI**

SUBJECT MATTER OF QUESTION (shortened/paraphrased)	BASIS FOR OBJECTION	CITATION
Who gave direction to the staff on what map should look like?	Legislative Privilege	11:14-22
Did Congressman Bob Brady support the bill?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	18:3-20
How did anyone communicate to you that a group of Democrats supported the bill?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	19:6-14
Are the state rules as to setting district lines good rules that are important to follow?	Legislative Privilege, insofar as question calls for communications with other members of legislature	34:1-13
What did you do to get the Democrats on board for bipartisan support?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	48:2-8
What are the names of the staff members who worked on the map?	Legislative Privilege	59:12 – 60:9
Was any partisan intent at play in the creation of the 17 th district?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	90:21-91:5
Were some legislators upset that the Lehigh Valley was being divided between two congressmen?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	92:8 - 24

SUBJECT MATTER OF QUESTION (shortened/paraphrased)	BASIS FOR OBJECTION	CITATION
Was the 17 th district intended to concentrate Democratic votes?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	94:22 – 95:14
Do you know why some Democratic members voted for the map?	Legislative Privilege, insofar as question calls for communications with other members of legislature or staff	95:24 – 96:4
Did Bill Schaller (“the head of our redistricting”) meet with members of Congress or their staff?	Legislative Privilege, insofar as question calls for information the Speaker learned in communications with other members of legislature or staff	99:8 – 21, <i>see also</i> 98:14-15